



*Ronald Murphy: 4600 Carleton, South Rockwood, MI
 CONTRACTORS/DISTRIBUTORS/JOBBERS PRESENT AT THE JOB SITES
 SUPPLYING AND/OR INSTALLING ASBESTOS CONTAINING INSULATION
 MATERIALS SUCH AS BLOCK, PIPECOVERING, CEMENTS, GASKETS,
 PACKING, TAPE, WICK AND/OR ASBESTOS WRAPPED/LINED BOILERS FOR
 FURNACES: Coon DeVisser; Brown Insulation

PRODUCTS

Kaylo P/C and Block
 7M-90 Cement

MANUFACTURERS

OWENS CORNING FIBERGLAS
 PHILIP CAREY CO. (Celotex/
 Rapid American)
 RUBEROID CO. (Gaf)
 W.R. GRACE
 AMCHEM PRODUCTS
 FLINTKOTE

Calsilite P/C and Block
 Zonolite Insulation
 Asb. Mastics
 Asb. Mastics

*Donald Kuchka: 4842 Mead, Dearborn, MI 48126
 CONTRACTORS/DISTRIBUTORS/JOBBERS PRESENT AT THE JOB SITES
 SUPPLYING AND/OR INSTALLING ASBESTOS CONTAINING INSULATION
 MATERIALS SUCH AS BLOCK, PIPECOVERING, CEMENTS, GASKETS,
 PACKING, TAPE, WICK AND/OR ASBESTOS WRAPPED/LINED BOILERS FOR
 FURNACES: Coon DeVisser; Owens Corning Fiberglas Corporation

PRODUCTS

Kaylo P/C and Block

MANUFACTURERS

OWENS CORNING FIBERGLAS

LAW OFFICES
 MICHAEL B. SERLING, P.C.
 30 NORTH OLD WOODWARD AVE
 SUITE 406
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 (248) 647-6966



*Larry Cox, 40643 Judd Rd., Belleville, MI 48111
 CONTRACTORS/DISTRIBUTORS/JOBBERS PRESENT AT THE JOB SITES
 SUPPLYING AND/OR INSTALLING ASBESTOS CONTAINING INSULATION
 MATERIALS SUCH AS BLOCK, PIPECOVERING, CEMENTS, GASKETS,
 PACKING, TAPE, WICK AND/OR ASBESTOS WRAPPED/LINED BOILERS FOR
 FURNACES: Arthur J. Peacock; Bigelow-Liptak; F.B. Wright; Schad
 Boiler

PRODUCTS

Kaylo P/C and Block
 7M-90 Cement

Asb. Millboard

Asb. Paper

Insulating Cement

Sk-7 & KS4 Gunning Refractory

Asb. Lined Firebrick

Asb. Rollboard

Stic-tite Cement

Insulating Cement

Insulating Cement

Asb. Block Insulation

Asb. Insulating and

Finishing Cements

Lite Kastite

Runner Patch and

Expansion Joint Sealer

Brikset

Zonolite Insulation

MANUFACTURERS

OWENS CORNING FIBERGLAS

PHILIP CAREY CO. (Celotex/
 Rapid American)

RUBEROID CO. (Gaf)

RUBEROID CO. (Gaf)

A.P. GREEN REFRACTORIES

A.P. GREEN REFRACTORIES

HARBISON WALKER

HARBISON WALKER

COMBUSTION ENGINEERING

GREFCO (General Refractories)

NARCO (North American Ref.)

PLIBRICO

PLIBRICO

CHICAGO FIRE BRICK

CHICAGO FIRE BRICK

CHICAGO FIRE BRICK

W.R. GRACE

LAW OFFICES
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 PACKING, TAPE, WICK AND/OR ASBESTOS WRAPPED/LINED BOILERS FOR
 FURNACES: Arthur J. Peacock; Bigelow-Liptak; F.B. Wright; Schad
 Boiler

<u>PRODUCTS</u>	<u>MANUFACTURERS</u>
Kaylo P/C and Block	OWENS CORNING FIBERGLAS
7M-90 Cement	PHILIP CAREY CO. (Celotex/ Rapid American)
Asb. Millboard	RUBEROID CO. (Gaf)
Asb. Paper	RUBEROID CO. (Gaf)
K-FAC Asb. Block Insulation	UNITED STATES GYPSUM
Insulating Cement	A.P. GREEN REFRACTORIES
Sk-7 & KS4 Gunning Refractory	A.P. GREEN REFRACTORIES
Asb. Lined Firebrick	HARBISON WALKER
Asb. Rollboard	HARBISON WALKER
Stic-tite Cement	COMBUSTION ENGINEERING
Insulating Cement	GREFCO (General Refractories)
Insulating Cement	NARCO (North American Ref.)
Asb. Block Insulation	PLIBRICO
Asb. Insulating and Finishing Cements	PLIBRICO
Lite Kastite	CHICAGO FIRE BRICK
Runner Patch and Expansion Joint Sealer	CHICAGO FIRE BRICK
Brikset	CHICAGO FIRE BRICK
Zonolite Insulation	W.R. GRACE

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 FURNACES: Arthur J. Peacock; Bigelow-Liptak; F.B. Wright; Schad
 Boiler

PRODUCTS

Kaylo P/C and Block
 7M-90 Cement

Asb. Millboard

Asb. Paper

K-FAC Asb. Block Insulation

Insulating Cement

Sk-7 & KS4 Gunning Refractory

Lightweight Insulating

Castable

Asb. Lined Firebrick

Asb. Rollboard

Stic-tite Cement

Zerobestos Cement

Lite Cast Insulating Castable

Insulating Cement

Insulating Cement

Narcolite Insulating

Castable

Asb. Block Insulation

Asb. Insulating and

Finishing Cements

Lite Kastite

Insulag

Asb. Mastics

Zonolite Insulation

MANUFACTURERS

OWENS CORNING FIBERGLAS
 PHILIP CAREY CO. (Celotex/
 Rapid American)

RUBEROID CO. (Gaf)

RUBEROID CO. (Gaf)

UNITED STATES GYPSUM

A.P. GREEN REFRACTORIES

A.P. GREEN REFRACTORIES

HARBISON WALKER

HARBISON WALKER

HARBISON WALKER

COMBUSTION ENGINEERING

STANDARD FUEL ENGINEERING
 (Asbestos Fibers supplied by
 REX/ROTO CORPORATION)

GREFCO (General Refractories)

GREFCO (General Refractories)

NARCO (North American Ref.)

NARCO (North American Ref.)

PLIBRICO

PLIBRICO

CHICAGO FIRE BRICK

QUIGLEY CO., INC.

AMCHEM PRODUCTS CO.

W.R. GRACE

*James McNeilly, 8253 Carrousel, Westland, MI 48185

PRODUCTS

7M Cement

Asb. Millboard

Asb. Paper

MANUFACTURERS

RUBEROID CO. (Gaf)

RUBEROID CO. (Gaf)

RUBEROID CO. (Gaf)

LAW OFFICES

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 Boiler

PRODUCTS

Kaylo P/C and Block
 7M-90 Cement

Asb. Millboard

Asb. Paper

K-FAC Asb. Block Insulation

Insulating Cement

Sk-7 & KS4 Gunning Refractory

Lightweight Insulating

Castable

Asb. Lined Firebrick

Asb. Rollboard

Stic-tite Cement

Zerobestos Cement

Lite Cast Insulating Castable

Insulating Cement

Insulating Cement

Narcolite Insulating

Castable

Asb. Block Insulation

Asb. Insulating and

Finishing Cements

Lite Kastite

Insulag

Zonolite Insulation

MANUFACTURERS

OWENS CORNING FIBERGLAS

PHILIP CAREY CO. (Celotex/
 Rapid American)

RUBEROID CO. (Gaf)

RUBEROID CO. (Gaf)

UNITED STATES GYPSUM

A.P. GREEN REFRACTORIES

A.P. GREEN REFRACTORIES

HARBISON WALKER

HARBISON WALKER

HARBISON WALKER

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STANDARD FUEL ENGINEERING
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GREFCO (General Refractories)

GREFCO (General Refractories)

NARCO (North American Ref.)

NARCO (North American Ref.)

PLIBRICO

PLIBRICO

CHICAGO FIRE BRICK

QUIGLEY CO., INC.

W.R. GRACE

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 Boiler

PRODUCTS

Kaylo P/C and Block	<u>MANUFACTURERS</u>
7M-90 Cement	OWENS CORNING FIBERGLAS
Asb. Millboard	PHILIP CAREY CO. (Celotex)
Asb. Paper	Rapid American)
K-FAC Asb. Block Insulation	RUBEROID CO. (Gaf)
Insulating Cement	RUBEROID CO. (Gaf)
Sk-7 & KS4 Gunning Refractory	UNITED STATES GYPSUM
Lightweight Insulating	A.P. GREEN REFRACTORIES
Castable	A.P. GREEN REFRACTORIES
Asb. Lined Firebrick	HARBISON WALKER
Asb. Rollboard	HARBISON WALKER
Stic-tite Cement	HARBISON WALKER
Zerobestos Cement	COMBUSTION ENGINEERING
Lite Cast Insulating	STANDARD FUEL ENGINEERING
Insulating Cement	(Asbestos Fibers supplied by
Insulating Cement	REX/ROTO CORPORATION)
Narcolite Insulating	GREFCO (General Refractories)
Castable	GREFCO (General Refractories)
Asb. Block Insulation	NARCO (North American Ref.)
Asb. Insulating and	NARCO (North American Ref.)
Finishing Cements	PLIBRICO
Lite Kastite	PLIBRICO
Insulag	CHICAGO FIRE BRICK
Zonolite Insulation	QUIGLEY CO., INC.
	W.R. GRACE

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WR GRACE-PIQ 005235-056

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 FURNACES: Arthur J. Peacock; Bigelow-Liptak; F.B. Wright; Schad
 Boiler

PRODUCTS

Kaylo P/C and Block
 Asb. Millboard
 Asb. Paper
 Insulating Cement
 Sk-7 & KS4 Gunning Refractory
 Asb. Lined Firebrick
 Asb. Rollboard
 Stic-tite Cement
 Insulating Cement
 Insulating Cement
 Asb. Block Insulation
 Asb. Insulating and
 Finishing Cements
 Lite Kastite
 Zonolite Insulation

MANUFACTURERS

OWENS CORNING FIBERGLAS
 RUBEROID CO. (Gaf)
 RUBEROID CO. (Gaf)
 A.P. GREEN REFRACTORIES
 A.P. GREEN REFRACTORIES
 HARBISON WALKER
 HARBISON WALKER
 COMBUSTION ENGINEERING
 GREFCO (General Refractories)
 NARCO (North American Ref.)
 PLIBRICO
 PLIBRICO
 CHICAGO FIRE BRICK
 W.R. GRACE

*Robert Prusky: 1166 Trayer Road, Bronson, MI 49028

PRODUCTS

Kaylo P/C and Block
 Insulating Cement
 Stic-tite Cement
 Insulag
 Zerobestos Cement
 Insulating Cement
 Insulating Cement
 Zonolite Insulation

MANUFACTURERS

OWENS CORNING FIBERGLAS
 A.P. GREEN REFRACTORIES
 COMBUSTION ENGINEERING
 QUIGLEY CO., INC.
 STANDARD FUEL ENGINEERING
 (Asbestos Fibers supplied by
 REX/ROTO CORPORATION)
 GREFCO (General Refractories)
 NARCO (North American Ref.)
 W.R. GRACE

*John Fortener: 15621 Fordline, Southgate, MI 48195

PRODUCTS

Kaylo P/C and Block
 Insulating Cement
 Stic-tite Cement
 Insulag
 Zerobestos Cement
 Insulating Cement
 Insulating Cement
 Zonolite Insulation

MANUFACTURERS

OWENS CORNING FIBERGLAS
 A.P. GREEN REFRACTORIES
 COMBUSTION ENGINEERING
 QUIGLEY CO., INC.
 STANDARD FUEL ENGINEERING
 (Asbestos Fibers supplied by
 REX/ROTO CORPORATION)
 GREFCO (General Refractories)
 NARCO (North American Ref.)
 W.R. GRACE

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Art Pendzu: 13677 Birrell, Southgate, MI
PRODUCTS MANUFACTURERS
Stic-tite Cement COMBUSTION ENGINEERING
Zerobestos Cement STANDARD FUEL ENGINEERING
(Asbestos Fibers supplied by
REX/ROTO CORPORATION)

*Richard Via: 4539 Linville, Warren, MI 48092
CONTRACTORS/DISTRIBUTORS/JOBBERS PRESENT AT THE JOB SITES
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MATERIALS SUCH AS BLOCK, PIPECOVERING, CEMENTS, GASKETS,
PACKING, TAPE, WICK AND/OR ASBESTOS WRAPPED/LINED BOILERS FOR
FURNACES: Arthur J. Peacock; Bigelow-Liptak; F.B. Wright; Schad
Boiler

<u>PRODUCTS</u>	<u>MANUFACTURERS</u>
Kaylo P/C and Block	OWENS CORNING FIBERGLAS
Ash. Millboard	RUBEROID CO. (Gaf)
Ash. Paper	RUBEROID CO. (Gaf)
Insulating Cement	A.P. GREEN REFRACTORIES
Stic-tite Cement	COMBUSTION ENGINEERING
Insulating Cement	GREFCO (General Refractories)
Insulating Cement	NARCO (North American Ref.)
Lite Kastite	CHICAGO FIRE BRICK
Zonolite Insulation	W.R. GRACE

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 MATERIALS SUCH AS BLOCK, PIPECOVERING, CEMENTS, GASKETS,
 PACKING, TAPE, WICK AND/OR ASBESTOS WRAPPED/LINED BOILERS FOR
 FURNACES: Arthur J. Peacock; Bigelow-Liptak; F.B. Wright; Schad
 Boiler

PRODUCTS

<u>PRODUCTS</u>	<u>MANUFACTURERS</u>
Kaylo P/C and Block	OWENS CORNING FIBERGLAS
7M-90 Cement	PHILIP CAREY CO. (Celotex)
Asb. Millboard	Rapid American)
Asb. Paper	RUBEROID CO. (Gaf)
Insulating Cement	RUBEROID CO. (Gaf)
Sk-7 & KS4 Gunning Refractory	A.P. GREEN REFRACTORIES
Lightweight Insulating	A.P. GREEN REFRACTORIES
Castable	HARBISON WALKER
Asb. Lined Firebrick	HARBISON WALKER
Asb. Rollboard	HARBISON WALKER
Stic-tite Cement	COMBUSTION ENGINEERING
Zerobestos Cement	STANDARD FUEL ENGINEERING
Lite Cast Insulating Castable	(Asbestos Fibers supplied by
Insulating Cement	REX/ROTO CORPORATION)
Insulating Cement	GREFCO (General Refractories)
Narcolite Insulating	GREFCO (General Refractories)
Castable	NARCO (North American Ref.)
Asb. Block Insulation	NARCO (North American Ref.)
Asb. Insulating and	PLIBRICO
Finishing Cements	PLIBRICO
Lite Kastite	CHICAGO FIRE BRICK
Insulag	QUIGLEY CO., INC.
Zonolite Insulation	W.R. GRACE

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 FURNACES: Arthur J. Peacock; Bigelow-Liptak; F.B. Wright; Schad
 Boiler

<u>PRODUCTS</u>	<u>MANUFACTURERS</u>
Kaylo P/C and Block	OWENS CORNING FIBERGLAS
Asb. Millboard	RUBEROID CO. (Gaf)
Asb. Paper	RUBEROID CO. (Gaf)
Insulating Cement	A.P. GREEN REFRactories
Sk-7 & KS4 Gunning Refractory	A.P. GREEN REFRactories
Asb. Lined Firebrick	HARBISON WALKER
Asb. Rollboard	HARBISON WALKER
Stic-tite Cement	COMBUSTION ENGINEERING
Insulating Cement	GREFCO (General Refractories)
Insulating Cement	NARCO (North American Ref.)
Lite Kastite	CHICAGO FIRE BRICK
Zonolite Insulation	W.R. GRACE

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 FURNACES: Arthur J. Peacock; Bigelow-Liptak; F.B. Wright; Schad
 Boiler

<u>PRODUCTS</u>	<u>MANUFACTURERS</u>
Kaylo P/C and Block	OWENS CORNING FIBERGLAS
Asb. Paper	RUBEROID CO. (Gaf)
Insulating Cement	A.P. GREEN REFRactories
Sk-7 & KS4 Gunning Refractory	A.P. GREEN REFRactories
Asb. Rollboard	HARBISON WALKER
Stic-tite Cement	COMBUSTION ENGINEERING
Insulating Cement	GREFCO (General Refractories)
Insulating Cement	NARCO (North American Ref.)
Lite Kastite	CHICAGO FIRE BRICK
Zonolite Insulation	W.R. GRACE

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WR GRACE-PIQ 005235-060

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 FURNACES: Arthur J. Peacock; Bigelow-Liptak; F.B. Wright; Schad
 Boiler

<u>PRODUCTS</u>	<u>MANUFACTURERS</u>
Kaylo P/C and Block	OWENS CORNING FIBERGLAS
Insulating Cement	A.P. GREEN REFRACTORIES
Sk-7 & KS4 Gunning Refractory	A.P. GREEN REFRACTORIES
Asb. Lined Firebrick	HARBISON WALKER
Asb. Rollboard	HARBISON WALKER
Stic-tite Cement	COMBUSTION ENGINEERING
Insulating Cement	GREFCO (General Refractories)
Insulating Cement	NARCO (North American Ref.)
Lite Kastite	CHICAGO FIRE BRICK
Zonolite Insulation	W.R. GRACE

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 CONTRACTORS/DISTRIBUTORS/JOBBERS PRESENT AT THE JOB SITES
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 MATERIALS SUCH AS BLOCK, PIPECOVERING, CEMENTS, GASKETS,
 PACKING, TAPE, WICK AND/OR ASBESTOS WRAPPED/LINED BOILERS FOR
 FURNACES: Arthur J. Peacock

<u>PRODUCTS</u>	<u>MANUFACTURERS</u>
Kaylo P/C and Block	OWENS CORNING FIBERGLAS
Asb. Millboard	RUBEROID CO. (Gaf)
Asb. Paper	RUBEROID CO. (Gaf)
Insulating Cement	A.P. GREEN REFRACTORIES
Sk-7 & KS4 Gunning Refractory	A.P. GREEN REFRACTORIES
Stic-tite Cement	COMBUSTION ENGINEERING
Insulating Cement	GREFCO (General Refractories)
Insulating Cement	NARCO (North American Ref.)
Asb. Block Insulation	PLIBRICO
Asb. Insulating and Finishing Cements	PLIBRICO
Lite Kastite	CHICAGO FIRE BRICK
Zonolite Insulation	W.R. GRACE

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WR.GRACE-PIQ 005235-061

*Jack Holbrook: 28136 Rose, Trenton, MI 48183
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 MATERIALS SUCH AS BLOCK, PIPECOVERING, CEMENTS, GASKETS,
 PACKING, TAPE, WICK AND/OR ASBESTOS WRAPPED/LINED BOILERS FOR
 FURNACES: Arthur J. Peacock

PRODUCTS

Kaylo P/C and Block
 Asb. Millboard
 Asb. Paper
 K-FAC Asb. Block Insulation
 Insulating Cement
 Sk-7 & KS4 Gunning Refractory
 Light Weight Castable
 Stic-tite Cement
 Insulag
 Insulating Cement
 Insulating Cement
 Asb. Block Insulation
 Asb. Insulating and
 Finishing Cements
 Lite Kastite
 Zonolite Insulation

MANUFACTURERS

OWENS CORNING FIBERGLAS
 RUBEROID CO. (Gaf)
 RUBEROID CO. (Gaf)
 UNITED STATES GYPSUM
 A.P. GREEN REFRACTORIES
 A.P. GREEN REFRACTORIES
 HARBISON WALKER
 COMBUSTION ENGINEERING
 QUIGLEY CO., INC.
 GREFCO (General Refractories)
 NARCO (North American Ref.)
 PLIBRICO
 PLIBRICO
 CHICAGO FIRE BRICK
 W.R. GRACE

*Gordon Zahn: 26471 Wick Road, Taylor, Michigan 48180
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 PACKING, TAPE, WICK AND/OR ASBESTOS WRAPPED/LINED BOILERS FOR
 FURNACES: Arthur J. Peacock

PRODUCTS

Kaylo P/C and Block
 Asb. Millboard
 Asb. Paper
 Insulating Cement
 Sk-7 & KS4 Gunning Refractory
 Light Weight Castable
 Stic-tite Cement
 Insulag
 Insulating Cement
 Insulating Cement
 Asb. Block Insulation
 Asb. Insulating and
 Finishing Cements
 Lite Kastite
 Zonolite Insulation

MANUFACTURERS

OWENS CORNING FIBERGLAS
 RUBEROID CO. (Gaf)
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 A.P. GREEN REFRACTORIES
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 HARBISON WALKER
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*Thomas Foley, 13655 Irvington, Warren, MI 48093
 CONTRACTORS/DISTRIBUTORS/JOBBERS PRESENT AT THE JOB SITES
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 MATERIALS SUCH AS BLOCK, PIPECOVERING, CEMENTS, GASKETS,
 PACKING, TAPE, WICK AND/OR ASBESTOS WRAPPED/LINED BOILERS FOR
 FURNACES: Schad Boiler

PRODUCTS

Kaylo P/C and Block
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 Asb. Paper
 Insulating Cement
 Sk-7 & KS4 Gunning Refractory
 Stic-tite Cement
 Insulating Cement
 Insulating Cement
 Lite Kastite
 Zonolite Insulation

MANUFACTURERS

OWENS CORNING FIBERGLAS
 RUBEROID CO. (Gaf)
 RUBEROID CO. (Gaf)
 A.P. GREEN REFRACTORIES
 A.P. GREEN REFRACTORIES
 COMBUSTION ENGINEERING
 GREFCO (General Refractories)
 NARCO (North American Ref.)
 CHICAGO FIRE BRICK
 W.R. GRACE

*Thomas Halley, 412 Virginia, Royal Oak, MI 48067
 CONTRACTORS/DISTRIBUTORS/JOBBERS PRESENT AT THE JOB SITES
 SUPPLYING AND/OR INSTALLING ASBESTOS CONTAINING INSULATION
 MATERIALS SUCH AS BLOCK, PIPECOVERING, CEMENTS, GASKETS,
 PACKING, TAPE, WICK AND/OR ASBESTOS WRAPPED/LINED BOILERS FOR
 FURNACES: Schad Boiler

PRODUCTS

Kaylo P/C and Block
 Asb. Millboard
 Asb. Paper
 Insulating Cement
 Sk-7 & KS4 Gunning Refractory
 Stic-tite Cement
 Insulating Cement
 Insulating Cement
 Lite Kastite
 Zonolite Insulation

MANUFACTURERS

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 CHICAGO FIRE BRICK
 W.R. GRACE

LAW OFFICES
 MICHAEL B. SERLING, P.C.
 10 NORTH OLD WOODWARD AVE
 SUITE 406
 BIRMINGHAM, MICH 48009
 (248) 647-6966



*Dennis Dion: 4524 Brunson Place, Traverse City, MI 49684
 CONTRACTORS/DISTRIBUTORS/JOBBERS PRESENT AT THE JOB SITES
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 FURNACES: F.B. Wright

<u>PRODUCTS</u>	<u>MANUFACTURERS</u>
Asb. Gaskets	FLEXITALLIC
Asb. Gaskets	GARLOCK, INC.
Asb. Gaskets and Packing	ANCHOR PACKING COMPANY
Asb. Gaskets and Packing	PALMETTO (Greene, Tweed)
Asb. Insulated Pumps	INGERSOLL-RAND

*Frederick Reeve: 1900 White Arum Lane, Knoxville, Tennessee 37922

CONTRACTORS/DISTRIBUTORS/JOBBERS PRESENT AT THE JOB SITES
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Asb. Insulated Pumps	INGERSOLL-RAND

*Victor Micallef: 41725 Sleepy Hollow, Novi, MI 48377
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*Richard Charzynski: 12161 Lennry, Shelby Township, MI 48315
 CONTRACTORS/DISTRIBUTORS/JOBBERS PRESENT AT THE JOB SITES
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*Ted Supal: 20300 Yale, St. Clair Shores, MI 48081
 CONTRACTORS/DISTRIBUTORS/JOBBERS PRESENT AT THE JOB SITES
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 (248) 647-6966

WR GRACE-PIQ 005235-065

DOCUMENTATION AS TO ALL EXPOSURES:

Any and all records of KELSEY-HAYES, includes all purchase orders, invoices, vendor files, product brochures, heat insulation standards, correspondences, account payable ledgers, material requisitions and inventories, etc.

Employment records of Plaintiff,

REDACTED

Union records of Plaintiff,

Custodian of Records of KELSEY-HAYES.

Any and all business records and product literature of defendants named in this suit, includes all purchase orders, invoices, product brochures, insulation manuals, data books, publications, correspondences, etc.

Custodian of Records of Defendants names in this suit.

All advertisements, publications and promotions of defendant manufacturers and distributors in this suit.

Photographs of all identified products.

*Denotes that the witness is a Plaintiff in an asbestos action.

Russell R. Beauoen
RUSSELL R. BEAUOEN (P41185)
Attorney for Plaintiffs
280 N. Old Woodward, Suite 406
Birmingham, Michigan 48009
(248) 647-6966

DATED: March 6, 2001

ldkc:\wp\brochure\halljr.wil

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(248) 647-6966

WR GRACE-PIQ 005235-066

STATE OF MICHIGAN

IN THE CIRCUIT COURT FOR THE COUNTY OF WAYNE

REDACTED

00-009321 NP 3/22/00
JDG: ROBERT J. COLOMBO JF

REDACTED

Plaintiff(s),

v
A P GREEN REFRactories CO

A.P. GREEN REFRactories CO., et al.,

Defendants.

RUSSELL R. BEAUDIOEN (P41185)
Attorney for Plaintiff(s)

SEE ATTACHED SHEETS
Attorney for Defendants,

PROOF OF SERVICE

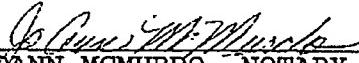
STATE OF MICHIGAN)
ss
COUNTY OF OAKLAND)

LINDA D. KRUMM, being first duly sworn, deposes and says that she is employed in the offices of MICHAEL B. SERLING, P.C., attorney for Plaintiff(s), and on the 15th day of MARCH, 2001 she served a true copy of: PLAINTIFF('S') DISCOVERY BROCHURE upon ALL COUNSEL OF RECORD, attorneys for DEFENDANTS, by then and there placing the same in an envelope bearing postage fully prepaid and addressed to said attorneys, at their offices located at: SEE ATTACHED SHEETS and then deposited the same in the U.S. Mail for delivery.

FURTHER DEONENT SAYS NOT.


LINDA D. KRUMM

Subscribed and sworn to before me
this 15th day of MARCH, 2001.


JOANN MCMURDO, NOTARY PUBLIC
OAKLAND COUNTY, MICHIGAN
MY COMMISSION EXPIRES: 12/27/2002



ATTORNEY OF RECORD LIST

REDACTED

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STATES GYPSUM; FLEXITALLIC
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GREENE TWEED & CO.; PLIBRICO
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REX ROTO CORP.; INGERSOLL-
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(517) 371-1730



ATTORNEY OF RECORD LIST

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(313) 649-7800

NEIL MACCALLUM (P33916)

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ERNEST WALKER (P58635)

Attorney for FLINTKOTE
Fifth Floor Columbia Center
201 W. Big Beaver Road
Troy, MI 48084
(248) 528-2200

JURY FEE
THIS DATE
BY _____



STATE OF MICHIGAN

IN THE CIRCUIT COURT FOR THE COUNTY OF WAYNE

REDACTED

ASBESTOS DOCKET

Plaintiffs,

00-009221 NF 3/22/00
JDG: ROBERT J. COLOMBO JW

vs.

15

A. P. GREEN REFRactories • CO.

A.P. GREEN REFRACTORIES COMPANY,
a Delaware Corporation;
AMCHEM PRODUCTS, INC.,
a Delaware Corporation;
(Benjamin Foster Company);
ARGO PACKING COMPANY,
a Pennsylvania Corporation;
ARMSTRONG WORLD INDUSTRIES, INC.
a Pennsylvania Corporation;
ARTHUR J. PEACOCK & COMPANY,
a Michigan Corporation;
BIGELOW-LIPTAK CORPORATION,
n/k/a A. P. Green Services, Inc.,
a Michigan Corporation;
BROWN INSULATION;
a Michigan Corporation;
CHICAGO FIRE BRICK COMPANY,
an Illinois Corporation;
COMBUSTION ENGINEERING, INC.,
a Delaware Corporation;
COON DEVISSE COMPANY,
a Michigan Corporation;
CROWN CORK AND SEAL COMPANY,
a New York Corporation;
DURAMETALLIC CORPORATION,
a Michigan Corporation;
F.B. WRIGHT COMPANY,
a Michigan Corporation;
FIBREBOARD CORPORATION,
a Delaware Corporation;
FLEXITALLIC GASKET COMPANY, INC.,
a Connecticut Corporation;
FOSECO, INC.,
a Delaware Corporation,
in its own right and as Successor
to Gibson-Homans Co., Baltimore
Ennis Land Co., Inc., and
as Subsidiary of Foseco Plc;
GAF CORPORATION,
a Delaware Corporation;

REDACTED

00 MAR 22 AM 8:53

TECHNICAL
PUBLISHED

LAW OFFICES
CHARLES B. SERLING, P.C.
1 NORTH OLD WOODWARD AVE.
SUITE 406
BIRMINGHAM, MICH. 48009



GARLOCK, INC.,
an Ohio Corporation;
GENERAL ELECTRIC COMPANY,
a New York Corporation;
GENERAL REFRactories,
a Pennsylvania Corporation;
GREENE, TWEED & COMPANY,
a Pennsylvania Corporation;
HARBISON-WALKER REFRactories,
a Division of Dresser Industries,
In., a Pennsylvania Corporation;
INGERSOLL-RAND COMPANY,
a New Jersey Corporation;
KAISER ALUMINUM AND CHEMICAL
CORPORATION, in its own right
successor to Kaiser Refractories,
a Division of Kaiser Aluminum,
a Delaware Corporation;
METROPOLITAN LIFE INSURANCE COMPANY,
a/k/a Metropolitan Insurance Company,
a Delaware Corporation;
MINNESOTA MINING AND
MANUFACTURING COMPANY (3M),
a Delaware Corporation;
ASBESTOS CLAIMS MANAGEMENT CORPORATION,
f/k/a National Gypsum Company,
a Delaware Corporation;
NORTH AMERICAN REFRactories COMPANY,
an Ohio Corporation;
OGLEBAY NORTON COMPANY,
f/k/a Ferro Engineering,
a Delaware Corporation;
OWENS CORNING FIBERGLAS CORPORATION,
a Delaware Corporation;
PITTSBURGH CORNING CORPORATION,
a Pennsylvania Corporation;
PLIBRICO COMPANY,
a Delaware Corporation;
QUIGLEY CO., INC.,
a New York Corporation;
RAPID-AMERICAN CORPORATION,
a Delaware Corporation, in its
own right and as successor to
PHILIP CAREY MANUFACTURING COMPANY,
and to PANACON CORPORATION, and to
PHILIP CAREY CORPORATION;
REX/ROTO CORPORATION
a Michigan Corporation;
RILEY STOKER CORPORATION,
a Massachusetts Corporation;

LAW OFFICES
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3 NORTH OLD WOODWARD AVE.
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BIRMINGHAM, MICH. 48009

(248) 647-6966

WR GRACE-PIA 005235-073

RUST INTERNATIONAL, INC.,
a Delaware Corporation
in its own right and as successor
in interest to M.W. Kellogg Company,
and the Swindell Dressler Company;
SCHAD BOILER SETTING COMPANY,
d/b/a Schad Refractory Construction
Company, a Michigan Corporation;
STANDARD FUEL ENGINEERING COMPANY,
a Michigan Corporation;
SURE SEAL PRODUCTS COMPANY,
an Illinois Corporation;
T & N, plc.,
f/k/a Turner and Newall, Ltd.,
a Foreign Corporation;
THIEM CORPORATION,
a/k/a Universal Refractories, Inc.,
a Delaware Corporation;
UNITED STATES GYPSUM COMPANY,
a Delaware Corporation;
W.R. GRACE & CO.-CONN.,
a Connecticut Corporation;

Defendants.

RUSSELL R. BEAUDEON (P41185)
MICHAEL B. SERLING, P.C.
Attorneys for Plaintiffs
280 N. Old Woodward Ave., Ste. 406
Birmingham, Michigan 48009
(248) 647-6966

NOTICE OF COMPLAINT
COMPLAINT AND JURY DEMAND

There is no other pending or resolved civil action arising
out of the transaction or occurrence alleged in the
complaint.

NOW COME Plaintiffs, by and through their Attorneys,
MICHAEL B. SERLING, P.C., and for their Complaint against each
Defendant, state as follows:

1. In compliance with Wayne County Circuit Court
Judge Robert J. Colombo, Jr.'s Case Management Order of
February 21, 1997, paragraph III. D., a Complaint was filed

LAW OFFICES
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2 NORTH OLD WOODWARD AVE.
SUITE 406
BIRMINGHAM, MICH. 48009
(248) 647-6966



Geographical Situs of Asbestos
Exposure: Wayne County, Michigan.

A TRIAL BY JURY IS HEREBY DEMANDED TO DETERMINE ALL
ISSUES.

Russell R. Beaudoin
RUSSELL R. BEAUDET (P41185)
Attorney for Plaintiffs
280 N. Old Woodward, Ste. 406
Birmingham, Michigan 48009
(248) 647-6966

DATED: March 20, 2000

LAW OFFICES
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(248) 647-6966

ATTACHMENT "A"**REDACTED**

In compliance with Wayne County Circuit Court Judge Robert J. Colombo, Jr.'s Order No. 11 of March 21, 1997, paragraph A, Plaintiff reserves the right to update asbestos product exposure identification after investigation of the case and review of the Social Security Printout and in accordance with the Court's Case Management Order deadline for submission of a final product identification brochure. Plaintiff's Known Job Site Information is as follows:

<u>KNOWN JOB SITES</u>	<u>YEARS AT JOB SITES</u>
Jacobs Industries Detroit, MI	1964-1965
Kelsey-Hayes	1965-1995

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ATTACHMENT "B"

REDACTED

In compliance with Wayne County Circuit Court Judge Robert J. Colombo, Jr.'s Case Management Order No. 11 of March 21, 1997, second paragraph of paragraph A, Plaintiff's Notice of Non-Parties are as follows:

ANCHOR PACKING COMPANY
BABCOCK & WILCOX COMPANY
CELOTEX CORPORATION
CAREY CANADA, INC.
EAGLE-PICHER INDUSTRIES, INC.
GRANT WILSON, INC.
JOHNS-MANVILLE CORPORATION
KEENE BUILDING PRODUCTS CORPORATION
KEENE CORPORATION
MANVILLE CORP.
M.H. DETRICK
NICOLET, INCORPORATED
RUTLAND FIRE CLAY COMPANY

WR GRACE-PIQ 005235-078

FILE COPY

OF COUNSEL
GOLDBERG, PERSKY,
JENNINGS & WHITE, P.C.
PITTSBURGH/SAGINAW
OF COUNSEL
PHILIP J. GOODMAN, P.C.

MICHAEL B. SERLING, P.C.
Attorneys and Counselors at Law
280 NORTH OLD WOODWARD AVENUE
SUITE 406
BIRMINGHAM, MICHIGAN 48009
(248) 647-6966
FAX (248) 647-9630

MICHAEL B. SERLING
RUSSELL R. BEAUDOEN
THOMAS A. SMITH
ERIC B. ABRAMSON

January 18, 2001

Clerk of the Court
Wayne County Circuit Court
201 Coleman A. Young Municipal Center
Detroit, Michigan 48226

RE:

REDACTED

Dear Clerk:

Enclosed for filing please find the following documents
regarding the above entitled cause of action:

1. Plaintiff('s') Answer to Defendants' First Standard Set of Interrogatories with Exhibits "A", "B", "C", "D" and "E" attached; and
2. Proof of Service (with Attorney of Record list attached).

Sincerely,

Michael B. Serling
Michael B. Serling

MBS:ldk
Enc.
cc All Counsel of Record
ldkc:\wp\interr\interr.ltr



STATE OF MICHIGAN
IN THE CIRCUIT COURT FOR THE COUNTY OF WAYNE

REDACTED

00-009221 NF 3/22/00
JDB: ROBERT J. COLOMBO JR.

Plaintiffs,
-v-
A.P. GREEN REFRATORIES CO.
et al /

VS
A P GREEN REFRATORIES CO

Defendants.
/

MICHAEL B. SERLING, (P20225)
Attorney for Plaintiffs
280 N. Old Woodward
Suite 406
Birmingham, Michigan 48009
(248)647-6966 /

ANSWER OF PLAINTIFF TO DEFENDANTS'
FIRST SET OF INTERROGATORIES

TO: ALL ATTORNEYS OF RECORD:

In accordance with the provisions of the Michigan General Court Rules, Plaintiff hereby answers the First Set of Interrogatories of Defendants served on Plaintiff's counsel.

Plaintiff, **REDACTED**, reserves the right to amend or supplement his answers if he thinks that inadvertent omissions or errors have been made or if additional or more accurate information becomes available that is required to be provided by the Michigan General Court Rules.

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(248) 647-6966

REDACTED



1. State all names by which you have been known, your date of birth (and date of death if applicable), all occupations; social security number, normal adult weight and height; weight at present or on date of death as the case may be.

ANSWER: a)
b)
c)
d)

REDACTED

e)
f)

2. State the address of each place of residence that you have occupied during the last twenty (20) years, and all other previous cities and states of residence, from age 16 to date of death. (specify dates of residence.)

ANSWER: **REDACTED**

3. State your past and present marital status, giving addresses of past and present spouses and children, and reason for termination of marriage. Please also identify all persons dependent upon you, setting forth the inclusive dates of such dependency.

ANSWER:

REDACTED

LAW OFFICES
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(248) 647-6966



Children:

REDACTED

4. Set forth your schooling, including public, private or trade schools, setting forth the dates of attendance and grade or level attended.

ANSWER: Simmons Elementary, Boynton Elementary, Morley Junior High, Southwestern High School - 1963 – High School Grad.; Wayne County Comm. College – late 1970's, Henry Ford Comm. College

5. Have you ever been a member of the armed forces of the United States? If so, state the following:

ANSWER: No.

- (a) The branch of the services, serial number and highest rank held;

ANSWER: N/A

- (b) The beginning and ending dates of your military service;

ANSWER: N/A

- (c) The types of discharge that you received;

LAW OFFICES
MICHAEL B. SERLING, P.C.
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SUITE 406
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(248) 647-6966



ANSWER: N/A

- (d) Whether you were given a physical examination which included x-rays prior to the time you entered the service;

ANSWER: N/A

- (e) Whether you received any injury while in the military service;

ANSWER: N/A

- (f) Whether you sustained or incurred any illness while in the military service;

ANSWER: N/A

- (g) Whether you were given a physical examination which included x-rays upon leaving the service;

ANSWER: N/A

- (h) Whether you claim disability for any injury or physical condition arising out of your military service.

ANSWER: N/A

6. State fully and in detail the date, place and nature of each:

ANSWER: Plaintiff objects to this Interrogatory for the reason that it is overbroad, irrelevant and not calculated to lead to the discovery of admissible evidence. Without waiving Plaintiff's objection, Plaintiff states:

- (a) Felony conviction;

ANSWER: No.

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- (b) Crime involving theft, dishonesty or false statement regardless of the punishment.

ANSWER: No.

7. With respect to each job on which you can presently recall working with or around asbestos products, state separately the following as to each such job:

ANSWER: Please see Exhibit "A" attached hereto and Plaintiff's Social Security Printout. Plaintiff objects to the balance of this Interrogatory on the basis that it is so broad, indiscriminate and unreasonable that it would be unduly burdensome and oppressive to require Plaintiff to answer. Plaintiff has worked with hundreds of asbestos containing products, the identity of which is sometimes known and sometimes not known. Response to this question would unfairly present a false impression that plaintiff was only exposed to those products which Plaintiff is now able to specifically recall. The attached was compiled from memory. This should in no way be construed as to contain each and every asbestos containing product to which Plaintiff was exposed. Plaintiff maintains that he was exposed to the products of all manufacturers of asbestos products shipped in Plaintiff's geographic work place during Plaintiff's career.

- (a) The name and address of each employer For whom you worked and the length of employment with each.

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- (b) The location of each job (stating the plant site, city, county and state);
- (c) With regard to the above listed jobs, please give a description of the job, and the nature of any asbestos exposure, including information regarding co-workers, supervisors, storage, et c., regarding each of these jobs;
- (d) For each job site, the type and identity of each such asbestos had contact or around which you worked, including the name of the product, the type of description of each such product and the manufacturer of the product;
- (e) As to each job site, state whether the employer, union, or anyone provided showers for employees;
- (f) As to each job site, state whether the employer, union or anyone provided separate lockers for both work and personal clothing.

8. If company employer or union sponsored physical examinations were required or made available, and if so state:

ANSWER: Yes.

- (a) Whether required or optional;

ANSWER: Required.

- (b) Frequency and dates of the examination;

ANSWER: 9/65

- (c) Nature and extent of examinations:

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ANSWER: Physical Exam.

- (d) Whether x-ray examinations were included;

ANSWER: No.

- (e) Frequency, including specific dates and time when you submitted to such examinations;

ANSWER: 9/65

- (f) Your detailed reasons for failing to submit to such examination when required or made available.

ANSWER: N/A

- (g) Results of each examination;

ANSWER: OK to work

- (h) Name, address, phone number of any examining physician, nurse or technician or clinic.

ANSWER: Plant and various clinics.

9. Has any of your work ever entailed working with other than asbestos material or under such ventilation conditions that you were subject to exposure to fibers, particles or other substance in the air, such as, but not limited to, sand, coal, fiberglass, etc. If so, give the details setting forth the employer, dates of employment, working conditions and substance involved.

ANSWER: No, other than fiberglass exposure and exposure to other substances in Defendant's products as related in Exhibit "A" attached hereto.

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10. To your knowledge, have any of your employers taken or had taken on their behalf air sampling, or did any government or other agency take air sampling at such employment sites? If so, identify said employer and give the details of the taking of air sampling, including the identity of the taker, the frequency of the taking and results thereof.

ANSWER: Yes. Air samples were taken in the plant periodically throughout my years of employment at Kelsey Hayes. Results were not made available to employees in 1980's and 1990's.

11. Have you ever been discharged or voluntarily left a position or changed residence due to health reason? If so, please state in detail the date(s), place(s) and medical conditions(s)

ANSWER: No.

12. Have you ever been hospitalized operated upon or confined to an institution, been an outpatient of any hospital, clinic, nursing home, suffered any personal injuries or illnesses other than those involved in this lawsuit? If so:

ANSWER: Please see Exhibit "B" and Exhibit "C" attached. Please also see answer to Interrogatory 5 (h) and 16, as applicable.

- (a) The date, place names of person involved and circumstances surrounding each such injury and related health care;
- (b) The nature and extent of the injury of illnesses, including all ill effects or disabilities remaining at the time of the last treatment or examination;

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- (c) The nature or extent of the injuries of illnesses, including any effects or disabilities remaining at the time of answering these Interrogatories;
- (d) The names and addresses of all persons who treated or examined you, together with the date of the last treatment or examination;
- (e) The nature, source and amount of any disability benefits, pensions, or together with the date of the last treatment or examination;

13. With respect to each physician or medical practitioner who examined or treated you from your eighteenth birthday, unless exposed prior to that time, state the following:

ANSWER: Please see Exhibit "B" and Exhibit "C" attached.

- (a) The name and address of each such physician or practitioner;
- (b) The complaint which caused you to see that particular physician or practitioner;
- (c) The type of examination and type of treatment that each physician or practitioner gave you;
- (d) The date or dates on which you were examined and treated by each physician or practitioner.

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14. For each and every condition and symptom, indication, malaise or affliction which you contend to be directly or indirectly related to any disease, disability or physical condition or state of your body or health, and which you contend is relevant to this lawsuit as having any effect on your health and well-being, please state the following:

- (a) Nature and description of such symptom;

ANSWER: Refer to Plaintiff's medical records and Exhibits "B" and "C".

- (b) The disease, disability or physical condition to which said symptoms are related, and the nature or extent of such relationship;

ANSWER: Refer to Plaintiff's medical records and Exhibit "B" and "C".

- (c) The date, time, place and manner in which such symptom first manifested itself, regardless of whether you were aware of the significance of any such symptom;

ANSWER: See Exhibits "B" and "C"

- (d) When such symptoms were made known to you, if you were previously unaware of the same, including all pertinent information as to the source of such knowledge;

ANSWER: See Exhibits "B" and "C"

- (e) Whether you contend such symptom is related in any fashion to asbestosis or

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pleuritis or any other condition from which you allegedly suffer, and the nature and extent of such relationship.

ANSWER: Yes.

15. When did you receive a diagnosis of such symptoms? Set forth all details of the persons involved in making the diagnosis, results of the diagnosis, and what was done by or to you as a result of such diagnosis.

ANSWER: Plaintiff was diagnosed with Asbestosis on 7/15/99. Please also see Exhibits "B" and "C".

- (a) Identify all documents related to such diagnosis.
- (b) Produce all such documents.

16. Have you ever at any time made a claim for or received any health or accident insurance benefits, worker's compensation payments, disability benefits, pensions, accident compensation payments or veteran's disability compensation awards? If so, state for each:

ANSWER: Yes.

- (a) The circumstances under which you received the benefits, awards or payments;

ANSWER: Retirement

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- (b) The illness, injury or injuries for which you received the benefits, awards or payments;

ANSWER: N/A

- (c) The names and addresses of your employers at the time of each injury or illness for which such an award was received or claimed;

ANSWER: N/A

- (d) The names and addresses of the examining doctors for each injury or illness;

ANSWER: N/A

- (e) The names of the superiors, officers, boards of tribunals before which or to whom the claim or claims were made or filed and the dates made or filed;

ANSWER: N/A

- (f) The amounts of the benefits, awards or payments;

ANSWER: \$1,263/monthly

- (g) The dates covering the times during which you received the benefits, awards or payments;

ANSWER: 1995-present

- (h) The agencies or insurance companies from whom you received the awards, benefits or payments;

ANSWER: Kelsey Hayes

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17. Please set forth specifically and in detail, all other examinations, tests and doctor visits which you may have received through your union, place of employment or other agency, other than those listed above.

ANSWER: Please see answer to Interrogatories 8 and 13.

18. Have you had or do you now have any health accident, life or hospitalization insurance policies (individual or group)? If so, state the name, type of insurance, the address of the insurance company, the dates of commencement and expiration of coverage, policy limits and policy number.

ANSWER: HAP - 680530
BC/BS - 80052

19. Other than as answered in Interrogatory 16, have you ever made any claims or filed suit for damages for any personal injury? If so, state:

ANSWER: Yes.

(a) The persons against whom said claim was made;

ANSWER: I filed a discrimination suit against Kelsey Hayes.

(b) The basis of such claim;

ANSWER: Discrimination.

(c) The nature and extent of the injuries claimed;

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ANSWER:

- (d) The present status of such claim, and if concluded, the final result, including the amount of any settlement.

ANSWER: Was awarded damages by jury in 1992 – settled in 1995 – approx. \$350,000.

20. Have you ever been a party to any other litigation? If so, describe:

ANSWER: Please see answer to Interrogatory 19.

- (a) The nature of the suit;
(b) The date, court and place where the suit was filed.

21. On what date did you first become aware that Asbestosis was a compensable occupational disease under a state or federal worker's compensation act, stating by what means and under what circumstances you became so aware.

ANSWER: Plaintiff objects to this Interrogatory for the reason it is irrelevant when Plaintiff became aware that asbestosis was a compensable occupational disease under a worker's compensation act.

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22. Are you aware that any adverse effects of exposure to asbestos and asbestos products may be cumulative in nature and that continued exposure to such materials by one suffering from asbestos or related illnesses may have a significant adverse effect on the extent and severity of such illness? If the answer is affirmative, please state:

ANSWER: Plaintiff objects to this Interrogatory for the reason that it is argumentative and calls for a conclusion beyond the scope of Plaintiff's knowledge.

- (a) The date, time and place that you first acquired such awareness;
- (b) The specific identity of each source of information providing or leading to such awareness;
- (c) Any change in your behavior, life style, occupation, work habits, etc., precipitated by such awareness;

23. After being informed that you were suffering from asbestosis, pleuritis or any alleged asbestos-related illness, did you continue to engage in any activity or occupation in which you encountered subsequent exposure to asbestos or asbestos containing materials? If your answer is affirmative, please state:

ANSWER: No.

- (a) Nature and description of such activity or occupation, including the employer on a work site;

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ANSWER: N/A

- (b) Your detailed reasons for engaging in such activity or occupation;

ANSWER: N/A

- (c) Whether your participation in such activity or occupation and consequential exposure to asbestos or asbestos containing materials was contrary to medical or professional advice (including such advice from employers, union representatives, publications, etc.); if so, state in detail.

ANSWER: N/A

1. The identity, description, address, etc., of each source of such advice;

ANSWER: N/A

2. The date, time and place such advice was given;

ANSWER: N/A

3. Identity of each person present or aware of such advice being given to you.

ANSWER: N/A

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24. State whether you ever made any complaint about working with asbestos products, and if so, the details of any such complaints, including when made, to whom made, the nature of such complaint, and the consequent action by any parties as a result of such complaint.

ANSWER: I do not recall.

25. Have you at any time during your life ever used any device (mask, respirator), or taken any action, measure of precaution (i.e., use of handkerchiefs, home medications), to reduce your possible exposure to, or inhalation of, asbestos dust or fibers? If the answer is affirmative, state:

ANSWER: Yes.

(a) The make, model and type;

ANSWER: Paper dust mask.

(b) From whom received;

ANSWER: Throughout employment.

(c) The company or employer requirements regarding use of such device;

ANSWER: Optional.

(d) The identity of all documents concerning such requirements or recommendations;

ANSWER: N/A

(e) The date and time of each period of use of such device.

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ANSWER: Mid-1960's to
Mid to 1990's

26. Did any of your employers, co-workers, or union members ever suggest or recommend that you might or should use any device to reduce your possible exposure to, or inhalation of, asbestos dust or fibers? If your answer is yes, state:

ANSWER: No.

(a) The identity of such individual;

ANSWER: N/A

(b) The date, time and place when such suggestion or recommendation was made;

ANSWER: N/A

(c) The identity of each person present when such suggestion or recommendation was made to or received by you;

ANSWER: N/A

(d) The identity of each person receiving same or similar suggestions or recommendations;

ANSWER: N/A

(e) The exact wording and content of such suggestion or recommendation or the substance thereof;

ANSWER: N/A

(f) Whether such suggestion or recommendation was written or oral, and:

ANSWER: N/A

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(1) If written, the identity of each writing;

ANSWER: N/A

(2) If oral, set forth all persons involved and the details as to the manner in which such suggestion or recommendation was presented.

ANSWER: N/A

(g) The type, make and model of each device referred to in each such suggestion or recommendation;

ANSWER: N/A

(h) The nature of any action, if any, taken by you in response to such suggestion;

ANSWER: N/A

(i) Describe in detail your reasons for any response to such suggestions or recommendation short of complete conformity thereto.

ANSWER: N/A

27. Have you ever been confined to bed or home as a result of any injury, illness or emotional or psychological illness or distress? If so, state in detail:

ANSWER: Yes.

(a) The dates during which you were confined to your home or bed;

ANSWER: Early 1970's I broke my right hand.

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(b) The address where such confinement took place;

ANSWER: Home.

(c) Identify those persons who have had knowledge
of such confinement;

ANSWER: Wife.

(d) Identify those persons who cared for you during
such confinement;

ANSWER: Wife.

28. State your average weekly or monthly earnings at the time of your
last full time employment.

ANSWER: Refer to Exhibit "E".

29. State fully and in detail your annual earnings for the past ten years,
setting forth the names of employers and the amounts if different employers
were involved during this period of time.

ANSWER: Please see Plaintiff's Social Security Printout.

30. Please set forth the effective date of your retirement and whether:

ANSWER: 10/6/95

(a) The retirement was mandatory or
voluntary;

ANSWER: Voluntary.

(b) The reasons for your retirement;

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ANSWER: Eligible to retire.

- (c) Alleged wage loss if any.

ANSWER: Please see Answer to
Interrogatories #39.

31. With regard to Plaintiff's medical condition, relevant working condition, or other circumstances complained of in this action, or related to the subject matter of this lawsuit, do you have knowledge of any photographs, charts, drawings, diagrams or other graphic representations concerning the same? If so:

ANSWER: Unknown.

- (a) How many pictures or documents were prepared?

ANSWER: N/A

- (b) On what dates were they taken or prepared?

ANSWER: N/A

- (c) What views, scenes or objects do they depict?

ANSWER: N/A

- (d) Identify the person making or preparing the same;

ANSWER: N/A

- (e) Identify the person having custody of the same;

ANSWER: N/A

- (f) Which of the above documents were made by you or on your behalf?

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ANSWER: N/A

32. Have you made any statement which was reduced to writing concerning the facts of this lawsuit or events concerning your medical history or asbestos exposure history, and the damages claimed to any person, including but not limited to, any police or law officer, insurance company representative, investigator, state or federal agent, or employee of any kind, or anyone else? If so, state the name and address of each and every such person or organization to whom these statements or reports were made, the dates made, and the purpose of which they were made.

ANSWER: Plaintiff objects to this Interrogatory as calling for information protected under the attorney work product doctrine. Without waiving Plaintiff's objection, Plaintiff states, please see Plaintiff's medical records.

(a) Identify all such statements.

ANSWER:

33. Do you or have you ever smoked tobacco products?

ANSWER: Yes.

34. If your answer is affirmative, state in detail:

(a) The type of tobacco products which you smoke or have smoked, i.e., cigarettes,

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